

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Pamela B. Schmitt,

Case No. 08-00031

Debtor(s).

Honorable John H. Squires

**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT OF FINAL
MORTGAGE CURE AMOUNT UNDER PARAGRAPH (B)(2)(b) OF PLAN**

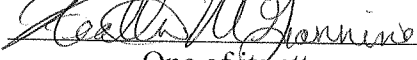
NOW COMES PNC Mortgage, a division of PNC Bank, National Association as successor by merger to National City Mortgage Co. (hereinafter "PNC Mortgage"), by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount Under Paragraph (B)(2)(b), states as follows:

1. On or about July 29, 2008, PNC Mortgage filed its Proof of Claim as Claim Number 6 for a sum of \$96.72 in pre-petition arrears.
2. The Debtor's Modified Chapter 13 Plan filed on March 4, 2008 and confirmed on March 7, 2008 set-forth a pre-petition arrearage amount owed to PNC Mortgage \$1,425.97.
3. PNC's pre-petition arrears of \$96.72 were paid by the Chapter 13 Trustee in full.
4. The Debtor's post-petition payments to PNC were to be paid by the Debtor directly "outside" of the plan.
5. The Debtor is currently due for the two mortgage payments for the monthly payments due April 2010 through May 2010 in the amount of \$1,394.80 per month and two late charges in the amount of \$48.36 per month for a total default \$2,886.32 as of May 11, 2010.

-2-

WHEREFORE, PNC Mortgage, a division of PNC Bank, National Association prays that the Court declare that the post-petition payments are not current at this time.

PNC MORTGAGE, a division of PNC
Bank, National Association

By: 
One of its attorneys

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